

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>UNITED STATES OF AMERICA</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 3:15-cr-00037-2</b>
	)	
<b>BENJAMIN BRADLEY,</b>	)	<b>Judge Trauger</b>
	)	
<b>Defendant.</b>	)	
	)	

**MOTION TO SUPPLEMENT  
ELECTRONIC RECORD FOR PURPOSES OF APPEAL**

The United States respectfully moves the Court to enter an order making the attached documents part of the electronic record in this case for purposes of appeal. The documents were all introduced into evidence as exhibits at Defendant Benjamin Bradley's sentencing hearing, held on February 1, 2017. Bradley's case is now pending before the Sixth Circuit, and Bradley's appellate counsel recently asked the undersigned for assistance in obtaining copies of the sentencing exhibits. The undersigned has sent scanned, electronic copies of the paper exhibits to Bradley's appellate counsel, and has separately sent hard copies of the discs containing the wiretap calls that were introduced into evidence. The government now moves to make scanned copies of the paper exhibits part of the electronic record, so that the parties and the Sixth Circuit may refer to them in the pending appeal. The undersigned has corresponded with Bradley's appellate counsel, who has no objection to this motion.

The attached documents are as follows, and are presented in the same order, and with the same description, as the Court's Exhibit and Witness List (DE# 874):

Attachment No.	Exhibit No.	Description
1	Def. Ex. 1	Summary of calls on defendant Bradley's telephone from wiretaps
2	Gov. Ex. 4	Photograph of DeRiggi holding money seized through search warrant of Bradley's parent's home
3	Gov. Ex. 6	Photograph of 3 watches
4	Gov. Ex. 7	Defendant's Receipts from Marquee Club in Las Vegas
5	Gov. Ex. 8	Many boxes of Air Jordan tennis shoes
6	Def. Ex. 2	Photograph of defendant Bradley's house
7	Def. Ex. 3	Copy of website showing purchase price of defendant Bradley[']s house
8	Def. Ex. 5	Letter from government to defense counsel regarding drug quantities

Respectfully submitted,

DONALD Q. COCRAN  
United States Attorney for the  
Middle District of Tennessee

s/ Cecil VanDevender  
Cecil VanDevender  
Assistant United States Attorney  
110 9<sup>th</sup> Avenue South, Suite A-961  
Nashville, Tennessee 37203

### **CERTIFICATE OF SERVICE**

I hereby certify that on May 8, 2018, I sent a copy of the foregoing via the Court's electronic filing system to Ronald Small, trial counsel for Benjamin Bradley, with a courtesy copy sent via email to Melissa Salinas, appellate counsel for Benjamin Bradley.

s/ Cecil VanDevender  
CECIL VANDEVENDER